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*Attorney for Defendants CHRISTA DOWNES*  
*fka CHRISTA SHEDD and*  
*BRADLEY RANDALL*

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

METROPOLITAN LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

DAVID M. DOWNES, DANIEL R.  
DOWNES, COLLEEN P. DOWNES,  
KAREN A. MACAULAY, BRADLEY  
RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS CHRISTA D.  
SHEDD and BRADLEY RANDALL TO  
RESPOND TO DEFENDANT KAREN  
A. MACAULAY'S MOTION FOR  
PROTECTIVE ORDER**

**[FIRST REQUEST]**

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall may have additional time, up to and including August 11, 2023, within which to file their response/opposition to Defendant Karen A. Macaulay's Motion for Protective Order [Doc. 38] Therefore, the last day for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall to file their response/opposition to the Motion for Protective Order [Doc. 38] will be August 11, 2023. The hearing on Defendant Karen A. Macaulay's Motion for Protective Order is presently scheduled to be heard on September 26, 2023, and as such, no prejudice will result to the Parties as a result of the requested extension of time.

...

Good cause exists as the Parties are actively discussing a possible resolution of the matters pending before this Court. Moreover, counsel for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall is scheduled to be outside the jurisdiction on the July 24, 2023, which is the date that the response would otherwise be due to be filed with the Court, and is expected to return to the office on or about July 31, 2023.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Counsel for Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

DATED this 17<sup>th</sup> day of July, 2023.

CLARK MCCOURT

/s/ Lukas B. McCourt

Brian P. Clark (Nevada Bar No. 4236)  
7371 Prairie Falcon Road, Suite 120  
Las Vegas, NV 89128  
*Attorneys for Defendants David R. Downes,  
Daniel Downes, Colleen P. Downes, and  
Karen A. Macaulay*

DATED this 17<sup>th</sup> day of July, 2023.

NEHME-TOMALKA AND ASSOCIATES

/s/ Doris Nehme-Tomalka

Doris Nehme-Tomalka (Nevada Bar No. 6431)  
2620 Regatta Drive, Suite 102  
Las Vegas, NV 89128  
*Attorney for Defendant  
Christa Downes aka Christa Shedd and  
Bradley Randall*

**ORDER**

IT IS SO ORDERED

DATED: 12:00 pm, July 18, 2023



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE